

John T. Morgan (USB #3839)

UNITED STATES DEPARTMENT OF JUSTICE

Office of the United States Trustee

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Attorney for Patrick S. Layng, United States Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION**

In re:

PERSEON CORPORATION,

Debtor.

Bankruptcy Case No. 16-24435 RKM

(Chapter 11)

Chief Judge R. Kimball Mosier

**UNITED STATES TRUSTEE'S LIMITED OBJECTION TO DEBTOR'S MOTION TO
SELL PROPERTY FREE AND CLEAR OF LIENS UNDER SECTION 363(f)**

Patrick S. Layng, the Acting United States Trustee for Region 19 through his attorney John T. Morgan hereby files this limited objection to the Debtor's Motion to Sell Property Free and Clear of Liens Under Section 363(f) as follows:

1. On May 23, 2016 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, in the United States Bankruptcy Court for the District of Utah.

2. The Debtor remains in possession of its assets and continues to manage its business as a debtor-in-possession pursuant to section 1107 and 1108 of the Bankruptcy Code.

No committee of unsecured creditors has been appointed in this case.
3. One day after the Petition Date, the Debtor filed its Motion to Sell Property Free and Clear of Liens Under Section 363(f) pursuant to an Asset Purchase Agreement dated May 17, 2016. Those pleadings identified MedLink Technologies, LLC as the purchaser and Stalking Horse Bidder, and specifically stated that the APA was negotiated as an arms-length transaction and that MedLink Technologies was a good faith purchaser.
4. Subject to the Debtor and MedLink Technologies establishing an evidentiary basis for the statement that the proposed sale was and is an arms-length transaction, the United States Trustee has no objection to the proposed sale in compliance with the Order Authorizing the Debtor's Entry into the Asset Purchase Agreement and Authorizing the Bidding Procedures and Auction entered June 22, 2016.

DATED: July 11, 2016

Respectfully submitted,

/s/

John T. Morgan
J. Vincent Cameron
Attorneys for Patrick S. Layng,
United States Trustee

CERTIFICATE OF MAILING

I HEREBY CERTIFY that, on July 11, 2016, I caused a true and correct copy of the foregoing **UNITED STATES TRUSTEE'S LIMITED OBJECTION TO DEBTOR'S MOTION TO SELL PROPERTY FREE AND CLAR OF LIENS UNDER SECTION 363(f)** to be electronically filed with the Court using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF System as noted below:

- Jeffrey M Armington armington.jeff@dorsey.com, asmus.natasha@dorsey.com, ventrello.ashley@dorsey.com
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Further, I certify that I caused copies of the **OBJECTION** to be forwarded via U.S. Mail, first class, postage prepaid and properly addressed to the following:

Jeffrey Chubak, Esq.
Storch Amini & Munves PC
2 Grand Central Tower
140 East 45th Street, 25th Floor
New York, NY 10017

_____/s/
John T. Morgan